

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA**

JANE DOE 1 and JANE DOE 2,

Plaintiffs,

vs.

BOARD OF REGENTS OF THE  
UNIVERSITY OF NEBRASKA,

Defendant.

Case No. 4:20-cv-03081

**PLAINTIFFS' MOTION FOR LEAVE TO  
FILE RESTRICTED ACCESS  
DOCUMENTS**

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Plaintiffs Jane Doe 1 and Jane Doe 2, pursuant to Neb. Civ. R. 5.3(C)(1), by and through undersigned counsel, respectfully moves the Court for leave to file restricted access documents in support of their Briefs in Opposition to Defendant's Motion for Summary Judgment (ECF No. 122) and Motion to Exclude Expert Testimony (ECF No. 123) ("Motions"). In support of this motion, Plaintiffs state:

1. The Court has entered an Order and Protective Order allowing Doe 1 and 2 to proceed under pseudonym and to designate matters documents and materials subject to disclosure as confidential. (ECF No. 70).
2. In support of Plaintiff's Briefs, Plaintiffs are filing exhibits, including discovery material marked confidential, or documents that reflect information from materials marked confidentially.
3. Such confidential discovery material is necessary evidence to support Plaintiffs' arguments in opposition to Defendant's Motions.

4. Because the documents themselves are protected as confidential or reflect confidential information, redaction would insufficiently protect the documents as required by the Court's Protective Order.
5. All the evidence submitted by Plaintiffs are confidential documents that ought to be restricted.
6. The confidential documents have been provisionally filed under restricted access.
7. Plaintiffs request the clerk of the court restrict access to all exhibits.

WHEREFORE, Plaintiffs respectfully request leave of the Court to file restricted access documents in opposition to Defendants' Motions.

DATED: November 1, 2024

Respectfully submitted,

/s/ Elizabeth K. Abdnour

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### **CERTIFICATE OF SERVICE**

I hereby certify that on November 1, 2024, the foregoing was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's electronic system.

/s/ Elizabeth K. Abdnour

Elizabeth K. Abdnour